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48741700

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February 7, 2012

Document Processing Desk (PM 32)
Registration Application
Office of Pesticide Program (7504P)
US EPA
1200 Pennsylvania Ave. NW
Washington, DC 20460

Dear Ms. Harris:

Subject: Micro-Pak
Enhanced Packaging Sheets (EPA Appl. No. 88401-X)^E
Application for Registration

Enclosed is an application for Registration of a sodium chlorite product, Enhanced Packaging Sheets. This is an "old chemical" registration with a formulators exemption and we have supplied all of the required product specific data. This product is being submitted under PRIA action code A540 with a fee of \$4,681. It has been pre-paid.

This product is a simple plastic sheet incorporating low levels of sodium chlorite which inhibits mold and mildew on packaged items. There are no other registered products that have this exact percentage of sodium chlorite, but there are many such products that have all of these similar uses.

The acute toxicity data that we have submitted shows a toxicity category IV for this product, so we have chosen not to include precautionary or first aid language as allowed for toxicity category IV products. We also ask that the Keep out of Reach of Children phrase be left off, due to the fact it is not toxic and no children can come in contact to the product when it is placed in these containers.

The eye irritation study is impossible to conduct due to the fact that the active ingredient is bonded to the plastic and there is no real possibility of getting the material in the eye. We are, therefore, requesting a waiver of that study and a request that this route of exposure be classified as toxicity category IV.



Enclosed is the following:

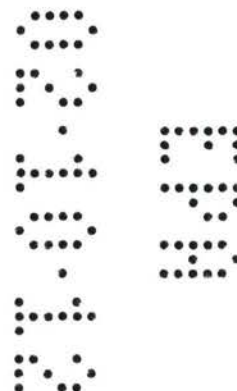
1. Five copies of the label
2. Two copies of the confidential statement of formula (8570-4)
3. One copy of the application form (8570-1)
4. One copy of the certification with respect to data form
5. One copy of the data matrix (both public and private)
6. Three copies of all conducted studies (7 Volumes)
7. One copy of the formulators exemption document
8. One copy of the transmittal document.
9. One copy of the letter of authorization
10. One copy of the payment certification

If you have any questions, please contact me at 571-275-0556 or at my email at bob@brennis.com.

Sincerely,



Robert S. Brennis



EPA TRANSMITTAL DOCUMENT

SUBMISSION DATED: February 7, 2012

STUDY SUBMITTER: Micro-Pak Ltd.

SUBMITTED IN SUPPORT OF: Micro-Pak Enhanced Packaging Sheets

EPA REGISTRATION NO.: 88401-~~X~~ E

REGULATORY ACTION: Application for Pesticide Registration – Old Chemical

STUDIES SUBMITTED: 7 Volumes

STUDY VOLUME 1 of 7: Chemistry Data for Micro-Pak Enhanced Packaging Sheets (January 27, 2012) by Robert Brennis; 13 pages non-confidential, 10 pages confidential appendix.

US EPA Guidelines 830.1550, 830.1600, 830.1650, 830.1670, 830.1750, & 830.1800

MRID Number: **48741701**

STUDY VOLUME 2 of 7:

Physical and Chemical Characteristics of Micro-Pak Enhanced Packaging Sheets (January 19, 2012) by Catherine Wo, Ph.D. 13 pages

US EPA Guidelines 830.6302, 830.6303, 830.6304, 830.6314, 830.7000, & 830.7300

MRID Number: **48741702**

STUDY VOLUME 3 of 7:

Acute Oral Toxicity Up and Down Procedures in Rats (January 20, 2012) by Jennifer Durando; 14 pages

US EPA Guidelines 830.1100 (2002)

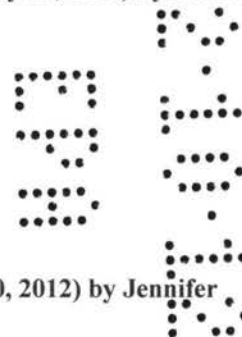
MRID Number: **48741703**

STUDY VOLUME 4 of 7:

Acute Dermal Toxicity Study in Rats – Limit Test (January 20, 2012) by Jennifer Durando; 14 pages

US EPA Guidelines 830.1200 (1998)

MRID Number: **48741704**



EPA TRANSMITTAL DOCUMENT – page 2
Micro-Pak, Enhanced Packaging Stickers

STUDY VOLUME 5 of 7: Acute Inhalation Toxicity Study in Rats – Limit Test (January 20, 2012) by Jennifer Durando; 9 pages

US EPA Guidelines 830.1300 (1998)

MRID Number: 48741705

STUDY VOLUME 6 of 7: Primary Skin Irritation Study in Rabbits (January 20, 2012) by Jennifer Durando; 14 pages

US EPA Guidelines 830.2500 (1998)

MRID Number: 48741706

STUDY VOLUME 7 of 7: Dermal Sensitization Study in Guinea Pigs (Buehler Method) (January 20, 2012) by Jennifer Durando; 21 pages

US EPA Guidelines 830.2600 (2003)

MRID Number: 48741707

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